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12 *Attorneys for Plaintiff*
13 BANQ, INC.

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 BANQ, INC., a Florida corporation,

17 Plaintiff,

18 v.

19 SCOTT PURCELL, an individual, GEORGE
20 GEORGIADES, an individual, KEVIN
LEHTINIITY, an individual, FORTRESS
21 NFT GROUP, INC. d/b/a FORTRESS BLOCK
CHAIN TECHNOLOGIES, a *Delaware*
22 corporation, and PLANET NFT, INC., a
Delaware corporation,

23 Defendants.
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CASE NO. 2:22-cv-00773-MMD-VCF

**JOINT STIPULATION AND
[PROPOSED] ORDER TO EXTEND
DEADLINES REGARDING
DEFENDANTS' MOTION TO DISMISS,
OR IN THE ALTERNATIVE, MOTION
FOR A MORE DEFINITE STATEMENT**

[First Request]

1 Subject to the Court's approval, the undersigned parties jointly stipulate and agree to extend
 2 the deadlines for the filing of any response and reply relating to Defendants' Motion to Dismiss, or
 3 in the Alternative, Motion for a More Definite Statement (the "Motion") (Dkt. 22), filed on June
 4 27, 2022, as follows:

5 WHEREAS, on May 16, 2022, Plaintiff Banq ("Banq") filed the Complaint in the above-
 6 captioned matter.

7 WHEREAS, pursuant to the Court's June 9, 2022 Order for Early Rule 34 Discovery and
 8 to Extend Deadline for Filing Responses to Complaint (Dkt. 21), on June 27, 2022, Defendants
 9 filed the Motion.

10 WHEREAS, pursuant to Local Rule 7-2, Banq's deadline to file and serve any points and
 11 authorities in response to the Motion is July 11, 2022 and Defendants' deadline to file and serve
 12 any reply in support of the Motion is July 18, 2022.

13 WHEREAS, the parties met and conferred and agreed to grant extensions of time to these
 14 deadlines as mutual professional courtesies in order to afford adequate time while dealing with
 15 competing professional obligations.

16 WHEREAS, the parties have agreed, subject to the Court's approval, that the deadline for
 17 Banq to file its response to the Motion should be extended to July 25, 2022 and Defendants'
 18 deadline to file their reply in support of the Motion should be extended to August 8, 2022.

19 **NOW THEREFORE**, the parties through their undersigned counsel, hereby stipulate and
 20 respectfully request that the Court enter an Order providing that: (i) the deadline for Banq's
 21 response to the Motion shall be July 25, 2022; and (ii) the deadline for Defendants' reply to the
 22 Motion shall be August 8, 2022.

23 Dated: July 1, 2022

24 GOODWIN PROCTER LLP

25
 26 By: /s/ Darryl M. Woo
 27 DARRYL M. WOO
 28 Attorneys for Plaintiff
 BANQ, INC.

1 Dated: July 1, 2022

GREENBERG TRAURIG, LLP

3 By: /s/ Christopher R. Miltenberger

4 CHRISTOPHER R. MILTENBERGER

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Attorneys for Defendants

ORDER

PURSUANT TO STIPULATION AND GOOD CAUSE SHOWING:

Plaintiff Banq shall have until July 25, 2022 to respond to Defendants' Motion to Dismiss, or In the Alternative, Motion for a More Definite Statement, and Defendants shall have until August 8, 2022 to file a reply in support of the Motion.

IT IS SO ORDERED:



CHIEF JUDGE MIRANDA M. DU

UNITED STATES DISTRICT JUDGE

DATED: July 5, 2022